



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
OREGON OPERATIONS OFFICE
805 SW Broadway, Suite 500
Portland, Oregon 97205

February 11, 2010

Mr. Robert Wyatt
Northwest Natural & Chairman, Lower Willamette Group
220 Northwest Second Avenue
Portland, Oregon 97209

Re: Portland Harbor Superfund Site; Administrative Order on Consent for Remedial Investigation and Feasibility Study; Docket No. CERCLA-10-2001-0240
PCB Modeling Approach – Contaminant Fate and Transport Model

Dear Mr. Wyatt:

This letter is in response to the LWG's memorandum dated January 20, 2010, regarding a proposed total PCB modeling approach for the Portland Harbor Superfund site. In our November 24, 2009, letter to the LWG regarding the contaminant fate and transport modeling approach, EPA suggested that the LWG further explore the strengths and weaknesses of modeling total PCBs rather than individual PCB congeners.

In the LWG's letter and subsequent meetings (January 13, 2010, and February 10, 2010), the LWG raised the following issues with regard to modeling total PCBs: 1) multiple sources with varying composition of PCBs; 2) spatial patterns of congener data (all targeted in source areas vs. site-wide coverage); 3) spatial variation in congener data composition; 4) weathering and breakdown of PCB sources; and 5) prevalence of aroclor data vs. congener data. The LWG has proposed to model PCB homolog groups rather than total PCBs to account for the variable composition of sources and weather/breakdown (shifting composition) of PCBs in the environment throughout the site. It is our understanding that this approach will require about one month to complete. EPA agrees that this approach is acceptable and the LWG should proceed with this approach immediately.

The LWG has further noted that only about one-third of the PCB data collected is congener data while two-thirds is aroclor data, and that the congener data is generally located in suspected source areas. In order to obtain a more robust initial condition of the site, the LWG proposed to investigate the relationship between the congener and aroclor data since all data points with congener data also have aroclor data. If a relationship is found, then this relationship could be used to convert the aroclor data at the site to homolog groups and used in the model.

It is our understanding that the congener/aroclor relationship investigation would take approximately one month and could be concluded concurrently with the conversion of PCB

congeners to homolog groups. At that time, or before, the LWG would provide EPA and partners with the conclusion of the investigation and recommendation for use in the model. If the recommendation of the LWG is to proceed with converting the aroclor data to homolog groups, it may take an additional month to complete. EPA agrees that the LWG should proceed to explore the relationship between congeners and aroclors. If a relationship between these cannot be established by March 19, 2010, then the LWG should consult with EPA about discontinuing this approach for the model effort that will support the draft FS. If the LWG is able to establish a relationship, the LWG must prepare a written report by March 31, 2010 describing the approach they will use in converting the aroclors to homolog groups and the basis for doing so.

EPA understands that the LWG has indicated the approach described above could potentially add 30 to 60 days to the schedule for delivery of the draft Feasibility Study. Because this and other time-critical work needs to be completed in the next couple of months, EPA would like to review and discuss the impacts of these work elements and the schedule for the Feasibility Study at our next project managers meeting, before determining whether any extension to the schedule is warranted. If you have any questions regarding this letter, please contact Chip Humphrey at (503) 226-2678 or Eric Blischke at (503) 226-4006.

Sincerely,

Chip Humphrey
Eric Blischke
Remedial Project Managers

cc: Greg Ulirsch, ATSDR
Rob Neely, NOAA
Ted Buerger, US Fish and Wildlife Service
Preston Sleeper, Department of Interior
Jim Anderson, DEQ
Kurt Burkholder, Oregon DOJ
David Farrer, Oregon Environmental Health Assessment Program
Rick Keppler, Oregon Department of Fish and Wildlife
Michael Karnosh, Confederated Tribes of Grand Ronde
Tom Downey, Confederated Tribes of Siletz
Audie Huber, Confederated Tribes of Umatilla
Brian Cunninghame, Confederated Tribes of Warm Springs
Erin Madden, Nez Perce Tribe
Rose Longoria, Confederated Tribes of Yakama Nation.

